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Attorneys for Defendants

VXN GROUP LLC; STRIKE 3 HOLDINGS, LLC;

GENERAL MEDIA SYSTEMS, LLC; and

MIKE MILLER

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

MACKENZIE ANNE THOMA, a.k.a. KENZIE ANNE, an individual and on behalf of all others similarly situated,

Plaintiff,

v.

VXN GROUP LLC, a Delaware limited liability company; STRIKE 3 HOLDINGS, LLC, a Delaware limited liability company; GENERAL MEDIA SYSTEMS, LLC, a Delaware limited liability company; MIKE MILLER, an individual; and DOES 1 to 100, inclusive,

Defendants.

Case No. _____

**DECLARATION OF TAYLOR BROCK
IN SUPPORT OF DEFENDANT'S
NOTICE OF REMOVAL**

[Los Angeles County Superior Court Case No. 23STCB08761]

KANE LAW FIRM
1154 S. Crescent Heights Blvd.
Los Angeles, CA 90035

DECLARATION OF TAYLOR BROCK

I, Taylor Brock, declare and state as follows:

1. I am over the age of eighteen years and am fully competent to make this declaration. The facts contained herein are based on my personal knowledge and are true and correct.

2. I am a Producer for VXN Group, LLC ("VXN"). I have been employed in this position since the company's inception in January 2020 and have actively participated on-set in the production of VXN's films.

3. In my capacity as a Producer, I have personal knowledge of the routine manner in which VXN film sets operate, including the scheduling, management, and requirements of various films.

4. Films produced by VXN consist of two distinct types of movies: Type-I films and Type-II films. Type-I films typically involve a different and more complex filming style that results in a longer duration on set. Type-I brands include "Vixen", "Blacked," "Slayed," and "Tushy." Type-II brands include "Blacked Raw," and "Tushy Raw."

5. To the best of my knowledge, from the time of VXN's inception (January 2020) to the present day, nearly all Type-I films have an on-set production duration of at least ten (10) hours. It is extremely rare for a Type-I film to wrap in less than ten (10) hours. Actors need to be on set during this time to complete hair and makeup, wardrobe, on set documentation and paperwork, rehearsals with the directors, as well as actual filming. I know this because my job requires me to be on set for the production of these films. In the past four years, I have been on set for nearly every Type-I film production.

6. The reasons for the long duration of Type-I films are manifold:

a. Complexity of Filming Techniques: Type-I films involve higher complexity in filming techniques, including but not limited to intricate camera movements, special effects, and precise lighting. These complexities necessitate additional time for setup, execution, and adjustments.

1
2 b. Detailed Makeup and Costumes: Actors in Type-I films usually require more
3 detailed and elaborate makeup and wardrobe. The application and maintenance of these
4 elements can be time-consuming.

5 c. More Complex Script: Type-I films often involve a more detailed plot line,
6 script, and production budget.

7 I declare under penalty of perjury under the laws of the United States that the foregoing
8 is true and correct.

9 Executed this 21 day of June, 2023, at Los Angeles, California.

10
11 
12 Taylor Brock

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Los Angeles, CA 90035

PROOF OF SERVICE
CCP 1013a(3)

I am employed in the County of Los Angeles of California. I am over the age of 18 and not a party to the within action. My business address is 1154 S. Crescent Heights Blvd., Los Angeles, CA 90035.

On June 21, 2023, I served the foregoing document(s) described as:

DECLARATION OF TAYLOR BROCK IN SUPPORT OF DEFENDANTS' NOTICE OF REMOVAL on each interested party in this action, as follows:

BIBIYAN LAW GROUP, P.C.
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Jeffrey D. Klein
Alexander D. Wallin
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Attorneys for Plaintiff Mackenzie Thoma

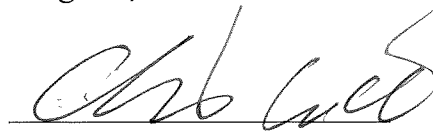
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☒ **BY USPS FIRST CLASS MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY EMAIL TO ALL PARTIES** (pursuant to California Code of Civil Procedure § 1010.6): I caused a true copy of the foregoing document(s) to be served by electronic email transmission at the time shown on each transmission, to each interested party at the email address shown above. Each transmission was reported as complete and without error.

☒ **FEDERAL** - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 21, 2023, at Los Angeles, California.


Chris Cude